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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the Transport of Dangerous Goods
(Thirteenth session,
Geneva, 7-17 July 1997,
agenda item (3 (d))

DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Other draft amendments

Standard for Limited Quantities Packaging

Transmitted by the Observer from New Zealand

Introduction

The transport of dangerous goods can be safely achieved by following the management system developed by the Committee of Experts. This system has a number of important elements including classification, marking and labelling, specification of packaging standards and documentation. Modal requirements are closely based on the Committee's Recommendations and include a further safeguard in the form of segregation requirements.

The current provisions for to the transport of Dangerous Goods in Limited Quantities remove several of the safety elements, such as packaging standards and segregation between packages. These are the most significant safety elements once the goods enter the transport system.

The packaging requirements for limited quantities are specified in section 15.3.2. This in turn specifies that packaging shall comply with sections 9.3.1, 9.3.2, 9.3.4 - 9.3.8 These sections describe the required performance but do not set any measurable standard (with the exception of 9.3.4). Therefor these sections are open to interpretation and hence variation.

Section 15.5 specifies that segregation requirements for dangerous goods need not apply within a vehicle or freight container. This provision is reflected in the current edition of the IMDG 96-28.

With the move from Recommendations to Model Regulations it is appropriate to specify measurable performance rather than purely descriptive performance.

Proposal

The Committee is requested (or invited) to consider setting a minimum standard for packaging used for the consignment of Dangerous Goods in Limited Quantities, based on measurable performance. Such a standard should improve safety, with out imposing significant additional packaging costs. Setting a standard would give clear guidance to industry which they could incorporate into their management and quality systems.

A possible way to set such a standard would be to amended section 15.3.1, by inserting the following text before the last sentence, which begins with "The total gross mass..."

"As a minimum standard, packaging should be capable of passing the stack test and drop test, using the test criteria in 9.7 for PG III. The consignor (shipper) of the Dangerous Goods in Limited Quantities, should satisfy themselves that the packaging can meet these requirements (for example by carrying out their own 'informal' tests, or by determining that the person packing the goods has carried out 'informal" tests). Packaging used for consigning Dangerous Goods in Limited Quantities should not be marked with the UN Packaging Mark, and Packaging Designating Type Code, unless the packaging has been 'formally' tested (as approved by the Competent Authority) and meets the design type criteria. A Competent Authority may request or carry out verification testing from time to time, but should not require all packaging used for Dangerous Goods in Limited Quantities to be design type tested."

Discussion

The advantage in adding this is that a measurable and enforceable standard would be set which can be seen as being proactive. The current descriptive requirements are purely reactive in that they require the packaging to fail in transport before it can be judged unsuitable. This wording also definitely sets a minimum standard. The only testing required for inner packagings placed in suitable outer packagings (similar to combination style packaging) is a drop test and a stack test. The current requirements require the fibre board used in the construction of fibre board boxes to meet a water absorption standard.

The above wording should allow packers of Dangerous Goods in Limited Quantities to carry out their own testing with minimal cost and provides definite guidance for companies wishing to act responsibly. Informal has been used in the proposal to indicate that the packaging does not have to be tested through the formal process used for design type approval/certification, which usually involves the use of a Certified or Approved test facility, and may also require Competent Authority approval.

It also provides a clear standard on which to base enforcement.